

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

ST. CLAIR COUNTY EMPLOYEES')	CIVIL ACTION NO. 3:18-cv-00988
RETIREMENT SYSTEM, Individually and on)	
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	Judge William L. Campbell, Jr.
)	Magistrate Judge Alistair E. Newbern
)	
vs.)	
)	
ACADIA HEALTHCARE COMPANY, INC.,)	
<i>et al.</i> ,)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION FOR EVIDENTIARY HEARING ON
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

For the reasons set forth in the accompanying memorandum of law in support of this Motion, Defendants¹ respectfully request that the Court schedule, at a time convenient to the Court and the parties, a short evidentiary hearing so that Defendants' expert, Lucy Allen, may explain her opinions and the underlying evidence conclusively demonstrating that the misrepresentations Plaintiffs² allege about Acadia's operations in the United States during the time period of April 30, 2014 through November 15, 2018 did not impact Acadia's stock price and, therefore, cannot support certification of a class for that time period.

¹ "Defendants" refers to Acadia Healthcare Company, Inc. ("Acadia"), Joey Jacobs, Brent Turner, and David Duckworth.

² "Plaintiffs" refers to New York Hotel Trades Council & Hotel Association of New York City, Inc. Pension Fund and Chicago & Vicinity Laborers' District Counsel Pension Fund.

Dated: March 1, 2022

Respectfully submitted,

/s/ Steven A. Riley

Steven A. Riley (BPR #006258)
Milton S. McGee, III (BPR #024150)
Elizabeth O. Gonser (BPR #026329)
Riley Warnock & Jacobson, PLC
1906 West End Avenue
Nashville, TN 37203
Telephone: (615) 320-3700
Facsimile: (615) 320-3737
sriley@rwjplc.com
tmcgee@rwjplc.com
egonser@rwjplc.com

Jessica P. Corley (*pro hac vice*)
Lisa R. Bugni (*pro hac vice*)
Ronni D. Solomon (*pro hac vice*)
Brandon R. Keel (*pro hac vice*)
KING & SPALDING LLP
1180 Peachtree Street N.E.
Atlanta, GA 30309
(404) 572-4600
jpcorley@kslaw.com
lbugni@kslaw.com
rsolomon@kslaw.com
bkeel@kslaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Christopher M. Wood
Robbins Geller Rudman & Dowd LLP
414 Union Street, Suite 900
Nashville, TN 37219
(615) 244-2203
cwood@rgrdlaw.com

Danielle S. Myers
David C. Walton
Darryl J. Alvarado
J. Marco Janoski Gray
Ting H. Liu
Timothy Alexander Benwa Folkerth
Robbins Geller Rudman & Dowd LLP
655 W Broadway, Suite 1900
San Diego, CA 92101
(619) 231-1058
danim@rgrdlaw.com
davew@csgrr.com
dalvarado@rgrdlaw.com
mjanoski@rgrdlaw.com
tliu@rgrdlaw.com
afolkerth@rgrdlaw.com

Jerry E. Martin
Barrett Johnston Martin & Garrison, LLC
Bank of America Plaza
414 Union Street, Suite 900
Nashville, TN 37219
(615) 244-2202
Fax: (615) 252-3798
jmartin@barrettjohnston.com

Michael Bauman
Pitta LLP
120 Broadway, 28th Floor
New York, NY 10271
(212) 652-3890
Fax: (212) 652-3891
mbauman@pittalaw.com

Justin J. Lannoye
Dowd, Bloch, Bennett, Cervone, Auerbach &
Yokich LLP
8 South Michigan Avenue, 19th Floor
Chicago, IL 60603
(312) 372-1361
Fax: (312) 372-6599
jlannoye@laboradvocates.com

Thomas C. Michaud
Vanoverbeke, Michaud & Timmony, P.C.
79 Alfred Street
Detroit, MI 48201
(313) 578-1200
tmichaud@vmtlaw.com

Matthew M. Guiney
Patrick Donovan
Regina M. Calcaterra
Thomas H. Burt
Wolf, Haldenstein, Adler, Freeman & Herz LLP
270 Madison Avenue
New York, NY 10016
(212) 545-4600
guiney@whafh.com
donovan@whafh.com
calcaterra@whafh.com
burt@whafh.com

Paul Kent Bramlett
Bramlett Law Offices
P O Box 150734
Nashville, TN 37215
(615) 248-2828
pknashlaw@aol.com

/s/ Steven A. Riley